

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

<b>John Doe</b>	)	
	)	
	)	
<b>Movant,</b>	)	<b>CIVIL ACTION FILE NO.</b>
<b>v.</b>	)	<b>1:22-CV-4558-JPB-CMS</b>
	)	Related to <i>PDV USA, Inc. v.</i>
	)	<i>Interamerican Consulting, Inc.</i> , No.
	)	20-cv-3699(S.D.N.Y)
<b>Interamerican Consulting, Inc.</b>	)	
	)	
<b>Respondent.</b>	)	

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**MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Appendix H, Rule II(J) of this Court’s Local Rules and Sec. K.ii of this Court’s Standing Order Regarding Civil Litigation for Cases Proceeding before the Honorable J.P. Boulee, Respondent Interamerican Consulting, Inc. (“Interamerican”) respectfully moves the Court for an Order granting leave for its *Response in Opposition to Motion Quash Subpoena* (“Response”) (Doc. 4) and Motion to Compel Deposition of Movant John Doe (“Motion to Compel”) (Doc. 5), including all attachments thereto, to be filed under seal until such time as the Court rules on Movant John Doe’s (“Mr. Doe”) *Motion for Leave to File Under Seal and Proceed Anonymously* (“Motion to Seal”) (Doc. 2). Interamerican has conferred with Mr. Doe, who does not oppose the relief sought in this motion.

Although Interamerican does not believe Mr. Doe will be able to make the requisite showing of good cause to overcome the public right of access, Interamerican believes that its Response and Motion to Compel should be sealed in their entirety until such as time as the Court rules on Mr. Doe's Motion to Seal. This will minimize any risk of potentially exposing Mr. Doe's identity if the Court ultimately determines that Mr. Doe should be permitted to proceed anonymously. *See* Fed. R. Civ. 5.2(d) ("The court may order that a filing be made under seal without redaction. The court may later unseal the filing or order the person who made the filing to file a redacted version for the public record.").

Respondent has filed contemporaneously with Motion a Brief in Support of Motion for Leave to File Under Seal well as a proposed order. Respondent has conferred with Movant and Movant does not oppose this Motion.

Respectfully submitted this 22nd day of November, 2022.

**PARKER, HUDSON, RAINER & DOBBS LLP**

/s/ Erik J. Badia

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*Local Counsel for Respondent Interamerican*

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*/s/ Jason W. Johnson*

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**CERTIFICATE OF COMPLIANCE**

In compliance with Local Rule 7.1D, I certify that the foregoing **MOTION FOR LEAVE TO FILE UNDER SEAL** has been prepared in conformity with Local Rule 5.1. The foregoing memorandum was prepared with Times New Roman (14 point) type, with a top margin of one and one-half (1 ½) inches and a left margin of one (1) inch. This memorandum is proportionately spaced, and is not longer than 25 pages.

This 22nd day of November, 2022.

/s/ Erik J. Badia  
Erik J. Badia

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day caused to be served a copy of the within and foregoing **MOTION FOR LEAVE TO FILE UNDER SEAL** upon all parties to this matter by electronically filing a copy of same with the Court's CM/ECF system, which will automatically send an electronic copy to all counsel of record.

This 22nd day of November, 2022.

/s/ Erik J. Badia  
Erik J. Badia